

SEYFARTH SHAW LLP

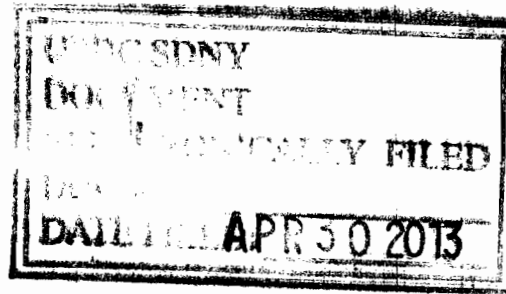
ATTORNEYS

Writer's direct phone

(212) 218-6291

Writer's e-mail

jegan@seyfarth.com



820 Eighth Avenue
New York, New York 10018
(212) 218-5500
fax (212) 218-5526
www.seyfarth.com

April 25, 2013

VIA FACSIMILE

(212) 805-6737

Hon. George P. Daniels, U.S.D.J.,
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

APR 30 2013
ORDERED
The conference is adjourned to
June 3, 2013 at 9:30 a.m.

George B. Daniels
HON. GEORGE B. DANIELS

Re: De La Rosa v. Tiago Holdings, LLC et al.,
Civil Action No. 13-CV-695 (GBD)

Dear Judge Daniels:

This office represents Defendant Aldi, Inc. ("Aldi") in the above-referenced matter. With the consent of all parties, we write to respectfully request an adjournment of the Initial Pretrial Conference presently scheduled for May 7, 2013 at 9:30 a.m. In addition, with Plaintiff's consent, we write to respectfully request an extension of Aldi's time to respond to the Complaint.

Aldi and Plaintiff are engaged in serious and substantial settlement discussions. These parties have scheduled an in-person meeting next week to discuss settlement. The undersigned has communicated with counsel for Plaintiff and Defendants Tiago Holdings, LLC ("Tiago") and Central Parking Systems of New York, Inc. These parties join in this request. The parties respectfully request a 30-day adjournment of the Initial Pretrial Conference to the week of June 4, 2013, at a date and time convenient to this Court. There have been no prior requests to adjourn this conference.

With Plaintiff's consent, Aldi also respectfully requests an extension of its deadline to respond to the Complaint to May 29, 2013. Its responsive pleading is presently due on April 29, 2013. The Court has generously granted Aldi two previous extensions of this deadline (Docket Nos. 12, 14).



April 25, 2013
Hon. George P. Daniels
Page 2

Alternatively, if the Court is not amenable to adjourning the Initial Pretrial Conference as requested by all parties, then Aldi would respectfully request an adjournment of its time to respond to the Complaint to May 6, 2013, which is Defendant Tiago's present deadline for a response (Docket No. 19).

We recognize and appreciate this Court's prior accommodations, and we thank the Court for its consideration of the requests set forth in this letter. These requests are being made in good faith, and not for the purpose of causing undue delay. Should the Court have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ John W. Egan

John W. Egan

JWE

cc: Glen H. Parker, Esq. (via e-mail)
Adam S. Hanski, Esq. (via e-mail)
Eric W. Ruden, Esq. (via e-mail)
Michael Tiliakos, Esq. (via e-mail)
Alon M. Markowitz, Esq. (via e-mail)